

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,
Defendants.

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Case No. 5:21-cv-844-XR
[Lead Case]

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,
Defendants.

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Case No. 5:21-cv-844-XR
[Lead Case]

DECLARATION OF JOHN B. SCOTT

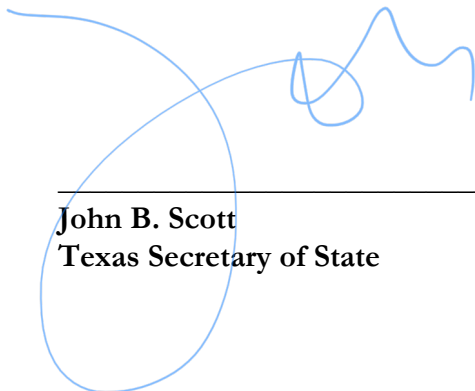
I, John B. Scott, hereby declare as follows:

1. I am over the age of eighteen years and am in all respects competent to make this declaration.
2. I currently serve as the Texas Secretary of State. I was appointed to this position on October 21, 2021, and I took the oath of office on October 28, 2021. I make this declaration in support of the Motion for a Protective Order in *La Unión del Pueblo Entero, et al. v. Abbott, et al.*, a lawsuit I understand is currently pending in the United States District Court for the Western District of Texas, San Antonio Division.
3. The Office of the Texas Secretary of State employs over 180 employees across multiple divisions. Our office performs myriad constitutional and statutory duties, including providing a repository for official and business and commercial records, publishing government rules and regulations, commissioning notaries public, maintaining the state seal, attesting to the Governor's signature on official documents, serving as the chief election officer for Texas, and serving as the chief international protocol officer for Texas and a senior advisor to the Governor for Texas border and Mexican affairs.
4. Immediately before serving as the Texas Secretary of State, I was an attorney and lobbyist in private practice.

5. Having reviewed the United States' operative complaint, I have a general understanding regarding which provisions of Senate Bill 1 (SB1) the United States is challenging in this lawsuit.
6. As an initial matter, I was not employed as Texas Secretary of State at the time SB 1 was passed by the Texas Legislature and do not have specific personal knowledge of facts related to the passage of the provisions of SB1 that are the subject of this lawsuit.
7. With respect to the provisions the United States is challenging, including facts related to the implementation of the provisions of SB1 that are the subject of this lawsuit, I believe that my knowledge of these matters is neither unique nor superior to the knowledge of other employees of the Office of the Secretary of State. Other employees have considerably greater familiarity with these matters than I do.
8. As explained in the motion to dismiss filed in this case, the United States seems to be complaining about implementation of the challenged provisions that is performed by local officials, not the Office of the Secretary of State, much less me personally. Further, the majority of information regarding implementation of the challenged provisions of SB1 was relayed to me via Office of the Secretary of State personnel, or by county election officials. I do not believe that my knowledge of any matters related to the United States' complaint is unique or superior to other employees of the Office of the Secretary of State, who have far more familiarity regarding the issues.
9. In addition, on the date of the deposition scheduled by the United States, I have an appointment with the ambassador of Namibia to the United States.
10. As of the date of this declaration, the Office of the Texas Secretary of State is involved in numerous lawsuits in both federal and state courts. To date, I have not been deposed in any other litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, Texas, on March ²¹____, 2022.



John B. Scott
Texas Secretary of State